

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

D.V.D.; M.M.; E.F.D.; and O.C.G.,

Plaintiffs,

v.

U.S. DEPARTMENT OF HOMELAND SECURITY;  
Kristi NOEM, Secretary, U.S. Department of  
Homeland Security, in her official capacity; Pamela  
BONDI, U.S. Attorney General, in her official  
capacity; and Antone MONIZ, Superintendent,  
Plymouth County Correctional Facility, in his official  
capacity,

Defendants.

Case No. 25-cv-10676

**DECLARATION OF ANWEN HUGHES**

I, Anwen Hughes, certify the following in support of my request for admission pro hac vice in the above-captioned matter:

1. I am the Director of Legal Strategy for Human Rights First's refugee programs. I am one of the attorneys for Plaintiffs D.V.D., M.M., E.F.D., and O.C.G. in the above-captioned case.

2. I am admitted to the New Jersey bar. I am admitted to practice before the courts of the State of New Jersey; the United States District Courts for the District of New Jersey and the Eastern District of Wisconsin; and the United States Court of Appeals for the Third Circuit.

3. I am a member in good standing of every jurisdiction in which I have been admitted to practice.

4. I am not the subject of any disciplinary proceedings pending in any jurisdiction in

which I am a member of the bar.

5. I have never had a *pro hac vice* admission to this court (or other admission for a limited purpose under Local Rule 83.5.3) revoked for misconduct.

6. I have read and agree to comply with the Local Rules of the U.S. District Court for the District of Massachusetts.

I declare under penalty of perjury that the foregoing is true and correct.

Executed March 23, 2025, in Jackson Heights, New York.

*s/ Anwen Hughes*

Anwen Hughes

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